



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

March 30, 2020

OFFICE OF THE
CHIEF FINANCIAL OFFICER

The Honorable Ron Johnson
Chairman, Committee on Homeland Security
and Governmental Affairs
United States Senate
Washington, D.C. 20510

Dear Mr. Chairman:

I am transmitting the U.S. Environmental Protection Agency's response to the October 2019 U.S. Government Accountability Office report entitled, *Information Technology: Agencies Need to Fully Implement Key Workforce Planning Activities* (GAO 20-129). The EPA prepared this response pursuant to 31 United States Code 720.

GAO Recommendation (Recommendation 11)

The Administrator of the Environmental Protection Agency should ensure that the agency fully implements each of the eight key IT workforce planning activities it did not fully implement.

EPA Response

The EPA agrees with the GAO's recommendation and remains committed to fully implementing all the IT workforce planning activities. The enclosed action plans outline the agency's response to the eight key IT workforce planning activities below.

1. *EPA did not develop a documented IT workforce planning process. (Not implemented)*

The EPA's cybersecurity workforce action plans present a robust model on how the agency plans to fill critical needs related to IT and application project management and information systems security. The EPA uses a multi-level approach with specific deliverables and goals based on hiring, recruitment/outreach, talent pipeline, retention, development/training and performance management. The EPA completed this activity in April 2019 and intends to review and reassess the actions and milestones identified in these IT workforce plans annually.

2. *EPA did not develop competency requirements for its IT workforce. (Partially implemented)*

Several actions in the EPA's workforce action plans focus on assessing competency requirements for work roles of critical need and addressing identified gaps by developing talent and training the IT workforce. Within each action, the EPA has dedicated milestones to track progress and determine success. The EPA is on track to complete this activity by June 2020. Once the initial

assessment is complete, managers of IT work roles of critical need will evaluate staff skill levels and address competency gaps on an annual basis.

3. *EPA did not assess competency needs regularly because, as previously stated, it did not develop competency requirements for its IT workforce. (Not implemented)*

As stated in the response to number 2, the EPA has scheduled actions and milestones that focus on developing initial competency requirements and intends to perform this analysis on an annual basis.

4. *EPA did not assess gaps in competency because, as previously stated, it did not develop competency requirements for its IT workforce. (Minimally implemented)*

As stated in the response to number 2, the EPA will complete this activity by June 2020.

5. *EPA did not develop strategies and plans to address gaps in competencies and staffing. (Minimally implemented)*

As stated in the response to number 1, the EPA developed and began implementing cybersecurity workforce action plans focused on addressing gaps in both competencies and staffing levels. One of the EPA's major actions in its workforce action plans focuses on developing talent and training its IT workforce. As part of this action, the EPA will standardize and optimize the use of available hiring authorities, develop targeted recruitment strategies to brand the EPA as an IT employer of choice, and identify opportunities to enhance the agency's policies aimed at addressing various needs of employees to improve job satisfaction and reduce attrition. As a result, the EPA has specific planned actions and measures dedicated to addressing competencies and staffing. The EPA will complete this activity by August 2020.

6. *While EPA has not developed strategies and plans to address gaps in competencies or staffing, it implemented other efforts identified in FITARA that can assist with preventing and addressing gaps. (Minimally implemented)*

As stated in the response to number 2, the EPA has actions and milestones focused on competency assessment and staffing. Once the competency requirements for its IT workforce are assessed and gaps are identified (by June 2020), the EPA will commence this key activity by August 2020.

7. *EPA did not monitor progress in addressing competency and staffing gaps because, as previously stated, it did not develop strategies and plans to address gaps. (Not implemented)*

The EPA has actions and milestones that focus on competencies and staffing. Milestones under these actions require annual and ongoing assessment. The agency's initial competency assessment is scheduled for completion by June 2020, and the EPA plans to monitor progress in the agency's effort to address IT competency and staffing gaps on an annual basis.

8. *EPA did not report to agency leadership on progress in addressing competency and staffing gaps because, as previously stated, it did not develop strategies and plans to address gaps. (Not implemented)*

The EPA's initial cybersecurity workforce action plans were reviewed by the agency's Chief Information Officer and Chief Human Capital Officer. The CIO and CHCO issued a joint memorandum with the action plans to agency leadership on June 5, 2019. The reporting requirements embedded in the milestones ensure that the EPA senior leadership will continue to receive progress updates on the agency's effort to address IT competency and staffing gaps. The EPA completed this activity in June 2019, and per the direction of the Office of Personnel Management, intends to update its workforce plans annually and will continue to report to the agency leadership on its progress.

The agency appreciates the opportunity to review and respond to the final GAO report. If you have any questions, please contact me or your staff may contact Thea Williams, in the agency's Office of Congressional and Intergovernmental Relations, by email at williams.thea@epa.gov or by phone at (202) 564-2064.

Sincerely,

**DAVID
BLOOM**

David A. Bloom
Acting Chief Financial Officer

 Digitally signed by
DAVID BLOOM
Date: 2020.03.30
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Enclosures (2)

AGENCY PLAN TO ADDRESS CYBERSECURITY WORK ROLES OF CRITICAL NEED

Foundational Elements

Agency: US Environmental Protection Agency (EPA)

Cybersecurity Work Role of Critical Need (title and OPM cyber code):

Information Systems Security Manager, Code 722

The critical EPA work roles related to this code are Information Security Officer (ISO) and Information Systems Security Officer (ISSO).

Root Cause(s) of Shortage in Work Role of Critical Need:

1. Lack of hiring is a root cause of our shortage of Information Systems Security Manager skills. We are unable to hire qualified candidates using the current hiring authorities and processes.
2. Lack of recruitment/outreach is a root cause of our shortage of Information Systems Security Manager skills. We don't get enough highly qualified applicants when we advertise for openings; and we don't advertise, or build networks, with enough applicant sources.
3. Lack of a talent pipeline is a root cause of our shortage of Information Systems Security Manager skills. There is an insufficient number of qualified candidates for this work role.
4. Lack of retention is a root cause of our shortage of Information Systems Security Manager skills. We are unable to retain qualified staff; and we cannot compete with either the private sector or other federal agencies that offer attractive pay and/or retention incentives.
5. Lack of development/training is a root cause of our shortage of Information Systems Security Manager skills. We have not comprehensively identified training opportunities aimed at developing this work role; and the opportunities we have identified are not readily accessible to individuals in this work role.
6. Lack of performance management is a root cause of our shortage of Information Systems Security Manager skills. We are not able to effectively manage performance of individuals in this role.

Define Success and/or Desired Outcome Upon Completion of Action Steps Described Below:

The desired outcome upon completion of EPA's plan to address cybersecurity work roles of critical need fall within four goals:

- Workforce Analytics: Deploy the right people with the right skills, aligned to the right position descriptions, in the right place, at the right time to meet mission requirements;

- Targeted Recruitment and Staffing: Strengthen EPA’s IT capability and ultimately IT posture through targeted recruitment and staff planning;
- Career Development and Training: Develop and sustain an informed and competent IT workforce with the skills and disposition to stay ahead of evolving IT needs; and
- Talent and Performance Management: Ensure EPA’s IT and cybersecurity workforce performs optimally to achieve mission requirement.

Progress Metric

The Progress Metric is an outcome-oriented measure that assesses progress in 1) mitigating the root cause of the critical skill shortage, and/or 2) strengthening the Work Role of Critical Need. The Progress Metric gauges the overall effectiveness and results of the Action Steps described in the table below. An agency will have at least one Progress Metric.

Metric	Description	Type	BASELINE		TARGETS	
			FY19	FY20	FY21	FY22
Manager satisfaction with the quality of applicants	Manager satisfaction with the quality of applicants filling 2210 (cybersecurity) positions increase from the baseline. <ul style="list-style-type: none"> - This metric will be based on data from the OPM CHCO Council Survey of each hiring manager after selections are made from certificates of eligibles. 	Quarterly	TBD	TBD	TBD	TBD
Reduction of skill shortages	Gap between current and desired ISO and ISSO skills shrink after interventions. <ul style="list-style-type: none"> - This metric will be based on the data gathered from the Talent Enterprise Diagnostic (TED) tool. 	Annual	TBD	Gap Closed by 50%	Gap Closed by 60%	Gap Closed by 70%

Action Steps and Milestones

The Action Steps and Milestones are activities the agency will conduct to address the root cause(s) of the critical skill shortage.

Actions to Be Taken	Milestones	Responsible Parties	Due Date	Status
Root Cause 1: Hiring				
1.1 Optimize hiring packages by revamping standard position packages and developing role-specific	1.1.1 Include OPM cyber code definitions in standardized GS 2210 PDs and institutionalize the use of the NICE Framework categories into the classification and staffing processes, specifically for 2210 positions.	CINC SSC, RTP SSC	3/13/19	Completed on 3/13/19 and issuance of the updated standard procedure is forthcoming

position descriptions (PDs) and job analyses.	1.1.2 Review and assess agency IT-related PDs (2210, 0335, 0854, 1550) to determine additional positions that may be standardized.	ORBO	10/30/19	
	1.1.3 Inform hiring IT managers of the PushButton PD tool, which can be used when developing non-standard position descriptions.	OISP, ORBO	11/30/19	
	1.1.4 Provide SME support to HR SSCs to update current standardized position packages and/or create a set of standardized, ladderred position packages for critical work roles (e.g., ISSO, IT project managers, etc.).	CIO, SIOs	4/30/20	
	1.1.5 Update position description libraries with both revised standardized PDs and new role-specific PDs for hiring manager use.	CINC SSC, RTP SSC	9/30/20	
1.2 Standardize and optimize the use of available hiring authorities.	1.2.1 Assess the agency's critical IT needs and proceed with requesting, as appropriate, the use of Direct Hiring Authority given to federal CIOs.	CHCO, CIO	7/30/19	
	1.2.2 Review agency hiring policies, compare to OPM policies and identify barriers, if any.	OHR, ORBO	12/30/19	
	1.2.3 Explore skills incentive pay or proficiency bonus options for IT professionals with requisite certifications.	OHR, ORBO	12/30/19	
	1.2.4 Provide guidance to hiring IT managers on best practices using non-competitive hiring authorities and recruitment incentives.	OHR, ORBO	2/28/20	
Root Cause 2: Recruitment/Outreach				
2.1 Develop targeted recruitment strategies to brand EPA as an IT employer of choice.	2.1.1 Research and identify where the talent pools are (e.g., universities, military, professional organizations) and what they are looking for in a job/career.	OHR, ORBO	1/30/20	
	2.1.2 Examine the landscape of existing internship and fellowship usage and best practices across the agency to determine what can be leveraged and/or repurposed for agencywide standardization and application (e.g., GSA 18F Program and EPA Innovation Fellowship Program).	OHR, ORBO	1/30/20	

	2.1.3 Formalize the agency's use of the CyberCorps Scholarship for Service program by marketing the program to the senior IT leadership community and annually participating in career fairs.	OHR, ORBO	10/1/19	
	2.1.4 Explore developing Memoranda of Understanding with local universities with quality cybersecurity programs to expose students to the federal IT enterprise and workforce.	ORBO	5/30/20	
	2.1.5 Review the current standard language used for agency USAJobs announcements and explore revising to appeal to an IT audience, as appropriate.	CINC SSC, ORBO, RTP SSC	8/30/20	Will align with the update of standard position packages (1.1.5)
Root Cause 3: Talent Pipeline				
3.1 Increase the availability of experienced and capable employees prepared for the ISO/ISSO work role by engaging managers in succession planning.	3.1.1 Review and assess workforce demographic data (retirement projections by occupational series along with attrition trends, location, etc.) for the ISO/ISSO role.	OHR, ORBO	9/30/19	
	3.1.2 Conduct an annual review of data to determine: demographics, retirement eligibility, trends, etc.	OHR, ORBO	Annually	Will implement and define timeframe after completion of 3.1.1
	3.1.3 Using the agency's succession planning guidebook, hold succession planning training for IT managers that oversee ISO/ISSO role, share best practices and establish timeline to draft 2 to 5-year succession plans.	OHR	1/30/20	
	3.1.4 Senior IT Leaders (SITL) overseeing the ISO/ISSO role draft a succession plan, with assistance from agency human capital specialists.	OHR, SITLs	6/30/20	
	3.1.5 Evaluate succession plans quarterly and advise IT leadership on how to revise, as appropriate.	OHR	Quarterly	Will implement and define timeframe after completion of 3.1.4
3.2 Invest in the interest and growth potential of onboard IT staff in other roles.	3.2.1 Strengthen the Information Security Task Force (ISTF) to operate as an agencywide cybersecurity community of practice, providing guidance on the direction and needs of the agency's cyber workforce.	OISP	Ongoing	Security Summit scheduled for May 21-23, 2019

	3.2.2 Consult with the ISTF to identify agency senior ISO subject matter experts who can act as mentors to federal staff interested in growing their cybersecurity skill set.	OISP, ORBO	9/30/19	
	3.2.3 Consult with the ISTF about exploring establishing a cybersecurity reskilling program, to offer cybersecurity and technology educations and on-the-job experience to federal employees not currently working in the ISO/ISSO field. (May use existing tools such as EPA Skills Marketplace or OPM Open Opportunities.)	OISP, ORBO	12/30/19	
Root Cause 4: Retention				
4.1 Identify opportunities to enhance the agency's policies aimed at addressing various needs of employees to enhance their job satisfaction and reduce attrition.	4.1.1 Review the agency policies for hiring and retention incentives (including special rate pay), compare to OPM policies and identify barriers and opportunities, if any.	OHR, ORBO	12/30/19	
	4.1.2 Review the agency policies for training, specifically paying for training certifications, compare to OPM policies and identify barriers and opportunities, if any.	OHR, ORBO	12/30/19	
Root Cause 5: Development/Training				
5.1 Evaluate skill gaps of current ISO/ISSOs.	5.1.1 Train SITLs overseeing the ISO/ISSO role to use the Talent Enterprise Diagnostic (TED) tool to assess current workforce and identify where skills gaps exist.	OHR	1/30/20	
	5.1.2 With assistance from agency human capital specialists, SITLs use the TED tool to complete and implement Individual Development Plans for onboard staff to close skill gaps, as appropriate.	OHR, SITLs	6/30/20	
	5.1.3 Train managers to continually evaluate staff skill levels using the TED tool to track progress towards closing skill gaps.	OHR	Annually	Will implement and define timeframe after completion of 5.1.1
5.2. Assess current training and development opportunities for ISO/ISSOs.	5.2.1 Develop EPA's Role Based Training (RBT) Program to train staff with significant security responsibilities in proper information security techniques and practices.	OISP	9/30/16	Program established on 9/30/16 and in place
	5.2.2 Ensure all newly appointed ISOs complete 100 RBT hours within 12 months of their appointment.	OISP	Ongoing	

	5.2.3 Ensure all ISOs who completed the initial 100-hour training complete their annual 25-hour training requirement.	OISP	Annually by Sept 30 th	
5.3 Identify future training opportunities for ISO/ISSOs.	5.3.1 Review list of certifications for the work role; assess the self-assessed survey completed in 2016 (determine if another needs to be performed) to determine gaps, if any; identify no-cost training that maps to certifications.	ORBO	3/30/20	
	5.3.2 Gather information about other, non-certification courses completed by EPA ISO/ISSO staff, analyze trends and develop a list of training recommendations to be used in conjunction with the TED tool.	OHR, ORBO	3/30/20	
Root Cause 6: Performance Management				
6.1 Confirm the amount of human capital resources (FTE) in the ISO/ISSO role and accurately reflect this data in centralized IT system(s).	6.1.1 Update the procedures for coding vacancies during the PD classification and hiring process.	CINC SSC, ORBO, RTP SSC	6/30/19	
	6.1.2 Review coded positions, identify anomalies, and determine areas to correct and create uniformity within the agency to accurately align cyber codes in HR system.	OHR, ORBO	8/30/19	
	6.1.3 Consult SITLs for recommendations of the optimal number of ISO and ISSO FTEs per major system based on scope and complexity and establish a baseline.	OISP, ORBO	9/30/20	
	6.1.4 Assess current state-of-play of ISO and ISSO per system and identify gaps.	OISP, ORBO	9/30/20	
6.2 Enhance the performance management process (PARS) by defining the ISO and ISSO roles agency-wide.	6.2.1 Identify supervisory subject matter experts to identify fundamental tasks and performance measures, as well as collect data on separate but related functions (e.g., privacy officials).	OISP, ORBO	12/30/19	
	6.2.2 SMEs confirm the requirement to include appropriate level of training (e.g., external certifications or EPA RBT) in performance plan.	OISP, ORBO	3/30/20	
	6.2.3 Draft suggested language for a standard critical element reference guide for ISO/ISSO, vetted by SIOs, and approved by the CIO and CHCO.	OHR, ORBO	6/30/20	

AGENCY PLAN TO ADDRESS CYBERSECURITY WORK ROLES OF CRITICAL NEED

Foundational Elements

Agency: US Environmental Protection Agency (EPA)

Cybersecurity Work Role of Critical Need (title and OPM cyber code):

IT Project Manager, Code 802

The critical EPA work role related to this code is Application Owner or IT Project/Program Manager.

Root Cause(s) of Shortage in Work Role of Critical Need:

1. Lack of hiring is a root cause of our shortage of IT Project Manager skills. We are unable to hire qualified candidates using the current hiring authorities and processes.
2. Lack of recruitment/outreach is a root cause of our shortage of IT Project Manager skills. We don't get enough highly qualified applicants when we advertise for openings; and we don't advertise, or build networks, with enough applicant sources.
3. Lack of development/training is a root cause of our shortage of IT Project Manager skills. We have not comprehensively identified training opportunities aimed at developing this work role; and the opportunities we have identified are not readily accessible to individuals in this work role.
4. Lack of performance management is a root cause of our shortage of IT Project Manager skills. We are not able to effectively manage performance of individuals in this role.

Define Success and/or Desired Outcome Upon Completion of Action Steps Described Below:

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- Workforce Analytics: Deploy the right people with the right skills, aligned to the right position descriptions, in the right place, at the right time to meet mission requirements;
- Targeted Recruitment and Staffing: Strengthen EPA's IT capability and ultimately IT posture through targeted recruitment and staff planning;
- Career Development and Training: Develop and sustain an informed and competent IT workforce with the skills and disposition to stay ahead of evolving IT needs; and
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The Progress Metric is an outcome-oriented measure that assesses progress in 1) mitigating the root cause of the critical skill shortage, and/or 2) strengthening the Work Role of Critical Need. The Progress Metric gauges the overall effectiveness and results of the Action Steps described in the table below. An agency will have at least one Progress Metric.

Metric	Description	Type	BASELINE		TARGETS	
			FY19	FY20	FY21	FY22
Manager satisfaction with the quality of applicants	<p>Manager satisfaction with the quality of applicants filling IT Project Manager positions increases from the baseline.</p> <ul style="list-style-type: none"> - This metric will be based on data from the OPM CHCO Council Survey of each hiring manager after selections are made from certificates of eligibles. 	Quarterly	TBD	TBD	TBD	TBD
Reduction of skill shortages	<p>Gap between current and desired IT Project Manager skills shrink after interventions.</p> <ul style="list-style-type: none"> - This metric will be based on the data gathered from the Talent Enterprise Diagnostic (TED) tool. 	Annual	TBD	Gap Closed by 50%	Gap Closed by 60%	Gap Closed by 70%

Action Steps and Milestones

The Action Steps and Milestones are activities the agency will conduct to address the root cause(s) of the critical skill shortage.

Actions to Be Taken	Milestones	Responsible Parties	Due Date	Status
Root Cause 1: Hiring				
1.1 Optimize hiring packages by revamping standard position packages and developing role-specific position descriptions (PD) and job analyses.	1.1.1 Include OPM cyber code definitions in standardized GS 2210 PDs and institutionalize the use of the NICE Framework categories into the classification and staffing processes, specifically for 2210 positions.	CINC SSC, RTP SSC	3/13/19	Completed on 3/13/19, and issuance of the updated standard procedure is forthcoming
	1.1.2 Review and assess agency IT-related PDs (2210, 0335, 0854, 1550) to determine additional positions that may be standardized.	ORBO	10/30/19	
	1.1.3 Inform hiring IT managers of the PushButton PD tool, which can be used when developing non-standard position descriptions.	OISP, ORBO	11/30/19	
	1.1.4 Provide SME support to HR SSCs to update current standardized position packages and/or create a set of	CIO, SIOs	4/30/20	

	standardized, laddered position packages for critical work roles (e.g., ISSO, IT project managers, etc.).			
	1.1.5 Update position description libraries with both revised standardized PDs and new role-specific PDs for hiring manager use.	CINC SSC, RTP SSC	9/30/20	
1.2 Standardize and optimize the use of available hiring authorities.	1.2.1 Assess the agency's critical IT needs and proceed with requesting, as appropriate, the use of Direct Hiring Authority given to federal CIOs.	CHCO, CIO	8/30/19	
	1.2.2 Review agency hiring policies, compare to OPM policies and identify barriers, if any.	OHR, ORBO	12/30/19	
	1.2.3 Explore skills incentive pay or proficiency bonus options for IT professionals with requisite certifications.	OHR, ORBO	12/30/19	
	1.2.4 Provide guidance to hiring IT managers on best practices using non-competitive hiring authorities and recruitment incentives.	OHR, ORBO	2/20/20	
1.3 Assess current workforce demographics data for use in future hiring strategies and plans.	1.3.1 Review and assess workforce demographic data (retirement projections, hiring trends, attrition trends, location, etc.) for the IT project manager role.	OHR, ORBO	9/30/19	
	1.3.2 Conduct an annual review of data to determine: demographics, retirement eligibility, trends, etc.	OHR, ORBO	Annually	Will implement and define timeframe after completion of 1.3.1
Root Cause 2: Recruitment/Outreach				
2.1 Develop targeted recruitment strategies to brand EPA as an IT employer of choice.	2.1.1 Research and identify where the talent pools are (e.g., universities, military, professional organizations) and what they are looking for in a job/career.	OHR, ORBO	1/30/20	
	2.1.2 Examine the landscape of existing internship and fellowship usage and best practices across the agency to determine what can be leveraged and/or repurposed for agencywide standardization and application (e.g., GSA 18F Program and EPA Innovation Fellowship Program).	OHR, ORBO	1/30/20	
	2.1.3 Review the current standard language used for agency USAJobs announcements and explore revising to appeal to an IT audience, as appropriate.	CINC SSC, ORBO, RTP SSC	8/30/20	Will align with the update of standard position packages (1.1.5)

Root Cause 3: Development/Training				
3.1 Evaluate skill gaps of current IT project managers.	3.1.1 Train SITLs overseeing IT project manager to use the Talent Enterprise Diagnostic (TED) tool to assess current workforce and identify where skills gaps exist.	OHR	1/30/20	
	3.1.2 With assistance from agency human capital specialists, SITLs use the TED tool to complete and implement Individual Development Plans for onboard staff to close skill gaps, as appropriate.	OHR, SITLs	6/30/20	
	3.1.3 Train managers to continually evaluate staff skill levels using the TED tool to track progress towards closing skill gaps.	OHR	Annually	Will implement and define timeframe after completion of 3.1.1
3.2 Assess current training and development opportunities used by IT project managers to identify future opportunities for group trainings.	3.2.1 Collect and analyze trends for courses completed by EPA staff (or developed by CIO office, e.g., Agile coaching and training) and other federal IT project managers; develop a list of training recommendations to be used in conjunction with the TED tool.	ORBO	3/30/20	
	3.2.2 Analyze the information gathered from senior IT leaders and data collected in the TED tool.	OHR, ORBO	11/30/20	
Root Cause 4: Performance Management				
4.1 Confirm the amount of human capital resources (FTE) performing IT project management function and accurately reflect this data in centralized IT system(s).	4.1.1 Update the procedures for coding vacancies during the PD classification and hiring process	CINC SSC, ORBO, RTP SSC	6/30/19	.
	4.1.2 Review coded positions, identify anomalies, and determine areas to correct and create uniformity within the agency to accurately align cyber codes in HR system.	OHR, ORBO	8/30/19	
	4.1.3 Consult senior IT leadership for recommendations of the optimal number of project manager(s) for each major IT investment and establish a baseline.	OISP, ORBO	9/30/20	
	4.1.4 Assess current state-of-play of IT project manager per major system and identify gaps.	OISP, ORBO	9/30/20	
4.2 Enhance the performance management process (PARS)	4.2.1 Identify supervisory subject matter experts to identify fundamental tasks and performance measures.	OISP, ORBO	12/30/19	

by defining the IT project management role agency-wide.	4.2.2 SMEs define appropriate COR level for this role and communicate it to supervisors of IT project managers.	OISP, ORBO	3/30/20	
	4.2.3 Draft suggested language for a standard critical element reference guide for IT project managers, vetted by SIOs and approved by the CIO and CHCO.	OHR, ORBO	6/30/20	